

**IN THE UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF TEXAS
MARSHALL DIVISION**

NETLIST, INC.,)	
)	
Plaintiff,)	
)	Case No. 2:22-cv-293-JRG
vs.)	
)	JURY TRIAL DEMANDED
SAMSUNG ELECTRONICS CO, LTD;)	(Lead Case)
SAMSUNG ELECTRONICS AMERICA,)	
INC.; SAMSUNG SEMICONDUCTOR)	
INC.,)	
)	
Defendants.)	

NETLIST, INC.,)	
)	
Plaintiff,)	
)	Case No. 2:22-cv-294-JRG
vs.)	
)	JURY TRIAL DEMANDED
MICRON TECHNOLOGY, INC.; MICRON)	
SEMICONDUCTOR PRODUCTS, INC.;)	
MICRON TECHNOLOGY TEXAS LLC,)	
)	
Defendants.)	

**DECLARATION OF YANAN ZHAO IN SUPPORT OF NETLIST, INC.'S OPPOSITION
TO SAMSUNG'S MOTION TO COMPEL PRODUCTION OF TESTIMONY FROM
NETLIST'S PRIOR LITIGATIONS AGAINST SK HYNIX**

I, Yanan Zhao, declare as follows:

1. I am an attorney at the law firm of Irell & Manella LLP, counsel for Plaintiff Netlist, Inc. (“Netlist”) in the above captioned action. I am a member of good standing of the State Bar of California and have been admitted to practice *pro hac vice* before this Court in this action. I provide this declaration in support of Netlist’s Opposition to Samsung’s Motion to Compel production of testimony from Netlist’s prior litigations against SK Hynix.

2. Attached as **Exhibit 1** is a true and correct excerpted copy of a letter from counsel for Samsung to counsel for Netlist dated July 14, 2023.

3. Attached as **Exhibit 2** is a true and correct excerpted copy of a letter from counsel for Samsung to counsel for Netlist dated August 7, 2023.

4. Attached as **Exhibit 3** is a true and correct copy of an email from counsel for Netlist to counsel for Samsung dated August 28, 2023.

I declare under penalty of perjury under the laws of the United States of America that the foregoing is true and correct.

Executed on October 6, 2023, in Los Angeles, California.

By /s/ Yanan Zhao
Yanan Zhao